



Clarification - Approved laboratories for *E. coli* analysis under the LT2 Rule.

EPA is clarifying its intention that the following types of laboratories certified for enumeration of total coliform, fecal coliform, and/or *E. coli* analysis are acceptable for *E. coli* analysis under LT2 when the laboratory uses the same enumeration technique for *E. coli* for which it is certified:

1. Laboratories certified by EPA, NELAC or the State for total coliform, fecal coliform, and/or *E. coli* analysis under source water certification programs, such as those required under 40 CFR Sec. 141.74, and
2. Laboratories certified by EPA, NELAC or the State for total coliform, fecal coliform, and/or *E. coli* analysis under other drinking water certification programs, such as those required under 40 CFR Sec. 141.21 (Total Coliform Rule),

Any such laboratory must have demonstrated that it is capable of enumeration of these organisms in a water sample.

This information is intended to clarify the laboratory certification requirements for *E. coli* analysis conducted for compliance with the requirements of the Long Term 2 Enhanced Surface Water Treatment Rule (LT2). EPA has received questions regarding these requirements.

The LT2 requirements for laboratories approved under the rule can be found in Sec.141.705. For *E. coli* analysis, the rule provides the following:

(b) E. coli. Any laboratory certified by the EPA, the National Environmental Laboratory Accreditation Conference or the State for total coliform or fecal coliform analysis under Sec. 141.74 is approved for E. coli analysis under this subpart when the laboratory uses the same technique for E. coli that the laboratory uses for Sec. 141.74.

Some have asked whether EPA intended to strictly limit approved laboratories to those approved under Sec. 141.74 (which applies to laboratories certified to conduct microbiological analysis of source water to determine continued compliance with filtration avoidance criteria). Others have asked whether a laboratory certified for presence/absence would be acceptable.

EPA did not intend to establish additional certification requirements for laboratories analyzing *E. coli* samples under LT2. The critical requirements are for 1) certification by EPA, NELAC or the State, and 2) enumeration, which is required for approval under Sec. 141.74. EPA will accept analytical results from any laboratory that meets both the condition for certification and for enumeration. This is consistent with EPA's intent as stated in the preamble to the LT2 rule (71 FR 727 (Jan. 5, 2006)):

- *EPA believes that laboratories that are certified to conduct coliform analyses in drinking water have the expertise to conduct E. coli analyses under today's rule, provided they use the analytical technique for which they are certified.*

- *Two commenters suggested that laboratories should be certified specifically for quantitative analyses of total or fecal coliform in a source water matrix. However, the methods approved for source water E. coli analyses under today's rule are also approved under the drinking water certification program. EPA believes that analysts certified for these methods under the drinking water certification program have the capability to perform the same methods for a source water matrix, even though additional steps may be required (such as dilutions).*

EPA is therefore clarifying its intention that the laboratories described in 1 and 2 above are acceptable for *E. coli* analysis under LT2 provided they are certified by EPA, NELAC, or any State, have demonstrated the ability to enumerate bacterial cells in a water sample, and use the analytical technique they are certified to use (e.g., membrane filtration, multiple-well, or multiple-tube). Laboratories certified for presence/absence analyses only would not meet the requirements for approval under 141.74 and therefore are not acceptable to conduct *E. coli* analysis under LT2.

Laboratory Registration

Microbiological laboratories are required to register on the LT2/Stage 2 Data Collection and Tracking System (DCTS) to submit *E. coli* data under the LT2 rule. To register, laboratories must submit a copy of their certification documents. To ensure registration, the laboratory should provide documents that clearly specify that the laboratory is certified by the appropriate authority and that it is certified to enumerate for total coliforms, fecal coliforms, or *E. coli*. Registrations from microbiological labs that do not specify such information will not be accepted. EPA will accept temporary or provisional certifications. The documentation necessary for registration includes the following:

- Certification status of the laboratory (certified, provisionally certified), the date the certification was issued, and the date the certification expires.
- The laboratory certification number
- Method(s) for which the laboratory is certified to enumerate

This information can be in the form of a letter from the appropriate regulatory agency or a copy of the certificate that was issued. Documentation should be submitted to the LT2/Stage 2 Information Processing and Management Center (IPMC) at the following address:

LT2ESWTR and Stage 2 DBPR
P.O. Box 98
Dayton, OH 45401

FAX: (937) 586-6557

After a laboratory has submitted acceptable certification documentation, it will be added to the list of qualified laboratories in the DCTS. Public water systems will then be able to select their laboratory from the list and the laboratory will be able to submit *E. coli* results for the PWS.

State Certification Programs

Some State certification programs do not currently include analysis of Proficiency Test (PT) samples for source water matrix analyses. EPA encourages states to include analysis of such PT samples in their certification programs.

Laboratories that have questions regarding their certification status or documentation should contact their State Laboratory Certification Program manager as listed at <http://www.epa.gov/safewater/labs/index.html>.

Questions?

For additional information, send an email to the Stage2 M-DBP mailbox at stage2mdbp@epa.gov, contact the Safe Drinking Water Hotline at 1-800-426-4791, or visit <http://www.epa.gov/safewater/disinfection/lt2/compliance.html>.